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Attorneys for Plaintiff Twitter,

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

TWITTER, INC.,

Case No. 14-cv-4480-YGR

Plaintiff,

**JOINT STIPULATION FOR
EXTENSION OF TIME TO FILE
STIPULATION REGARDING FURTHER
PROCEEDINGS FOLLOWING
DEFENDANTS' ASSERTION OF STATE
SECRETS**

V.

WILLIAM P. BARR, Acting Attorney General
of the United States, *et al.*

Defendants.

Hon. Yvonne Gonzalez Rogers

1 Pursuant to Local Rules 6-1 and 6-2, Plaintiff Twitter, Inc. and Defendants William P.
2 Barr, the United States Department of Justice, Christopher Wray, and the Federal Bureau of
3 Investigation (collectively, “Defendants”), by and through their respective counsel of record,
4 submit the following joint stipulation.

5 WHEREAS:

6 1. On February 14, 2019, the Court granted the parties’ prior joint stipulation and
7 ordered (1) the Government, by March 15, 2019, to inform the Court and Twitter whether it
8 intends to assert the state secrets privilege in this matter, and (2) the parties, by March 19, 2019,
9 to submit “a proposed schedule for further proceedings based on the Government’s decision
10 regarding an assertion of the state secrets privilege (including a proposed briefing schedule if the
11 Government does decide to invoke the state secrets privilege).” Dkt. No. 272.

12 2. On or about March 15, 2019, Defendants filed a Request that the Court Discharge
13 the Order to Show Cause and Deny Plaintiff’s Request for Access to the Classified Steinbach
14 Declaration, or in the Alternative, a Motion to Dismiss in Light of the Attorney General’s
15 Assertion of the State Secrets Privilege (the “State Secrets Motion”). *See* Dkt. No. 281 (Motion);
16 *see also* Dkt. No. 282 (Notice of Lodging of Classified Declaration of Michael C. McGarrity).

17 3. On March 18 and 19, 2019, the parties met and conferred regarding further
18 proceedings in this matter in light of Defendants’ State Secrets Motion.

19 4. In light of the numerous issues raised—both in the State Secrets Motion and in the
20 course of the parties’ meet-and-confer—Twitter requires two additional days to consider how it
21 would like to proceed.

22 5. Accordingly, the parties have jointly agreed to stipulate to a two-day extension of
23 time to file their joint stipulation regarding further proceedings in light of the Government’s
24 assertion of state secrets.

25 6. A proposed order on the parties’ joint stipulation is attached hereto.

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1 Agreed to and submitted by:

2 Dated: March 19, 2019

MAYER BROWN LLP

3 /s/ Lee H. Rubin

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14 *ATTORNEYS FOR PLAINTIFF*
15 TWITTER, INC.

16 Pursuant to General Order No. 45, I, Lee H. Rubin, attest that I obtained concurrence in
17 the filing of this document from the following signatories.

18 Dated: March 19, 2019

19 JOSEPH H. HUNT

20 Assistant Attorney General

21 DAVID L. ANDERSON

22 United States Attorney

23 ANTHONY J. COPPOLINO

24 Deputy Branch Director

25 JULIA A. HEIMAN (Bar No. 241415)

26 Senior Counsel

27 CHRISTOPHER HEALY

28 Trial Attorney

19 /s/ Julia A. Heiman

20 JULIA A. HEIMAN, Bar No. 241415

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

TWITTER, INC.,

Plaintiff,

V.

**WILLIAM P. BARR, Acting Attorney General
of the United States, et al.**

Defendants.

Case No. 14-cv-4480-YGR

**[PROPOSED] ORDER GRANTING
JOINT STIPULATION FOR
EXTENSION OF TIME TO FILE
STIPULATION REGARDING FURTHER
PROCEEDINGS FOLLOWING
DEFENDANTS' ASSERTION OF STATE
SECRETS**

Hon. Yvonne Gonzalez Rogers

1 Pursuant to the stipulation of the parties, the Court hereby GRANTS the joint stipulation
2 for an extension of time for the parties to submit a proposed schedule for further proceedings
3 based on the Government's decision to assert the state secrets privilege. The Court hereby
4 extends the deadline for the parties to file such joint stipulation to March 21, 2019.

5 IT IS SO ORDERED.
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7 Dated:
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The Hon. Yvonne Gonzalez Rogers
United States District Judge